



**AT&T**

**Patrick W. Turner**  
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August 25, 2017

The Honorable Jocelyn Boyd  
Chief Clerk of the Commission  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, South Carolina 29211

Re: TCA's Petition Requesting the Commission's Intervention in Numbering  
Resources Determinations  
Columbia Rate Center – PricewaterhouseCoopers, LLP

Dear Ms. Boyd:

Teleport Communications America, LLC ("TCA") respectfully encloses for filing a  
Petition for Review of Numbering Resources Determination in the Columbia rate center in the  
above-captioned matter. In summary:

TCA submitted an NXX Assignment Request via the Pooling Administration System on  
August 21, 2017;

TCA's customer requesting numbering resources is PricewaterhouseCoopers LLP;

TCA requested the assignment of a thousands-blocks in the Columbia rate center in the  
format of 803-766-7XXX, 803-881-7XXX, or 803-977-3XXX;

The request impacts the Columbia rate center;

At the time of the filing of the numbering resource request, the Columbia Rate Center had  
an MTE of 12.245 and utilization of 92.033%.

By copy of this letter, I am serving a copy of this document on all parties of record as  
indicated on the attached Certificate of Service.

Sincerely,

Patrick W. Turner

PWT/sh  
Enclosures

BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA

In Re: TELEPORT COMMUNICATIONS	)	
AMERICA, LLC PETITION	)	
REQUESTING THE COMMISSION'S	)	Docket No.
INTERVENTION IN NUMBERING	)	
RESOURCES DETERMINATIONS	)	
_____	)	

PETITION FOR REVIEW OF NUMBERING RESOURCES DETERMINATION  
IN THE COLUMBIA RATE CENTER

Teleport Communications America, LLC ("TCA"), pursuant to rules adopted by the Federal Communications Commission ("FCC") for challenging numbering determinations, petitions the Public Service Commission of South Carolina ("Commission") for review of a recent denial of TCA's application for use of numbering resources in the 803 area code. Numbering determinations are made by the North American Numbering Plan Administrator ("NANPA") and/or the Pooling Administrator ("PA"), depending on the nature of the numbering request. The FCC's rules addressing these matters, however, generalize responsibilities of the NANPA and the PA under the heading "Central office code administration,"<sup>1</sup> and the FCC's Orders addressing these matters allow for challenges of determinations by both entities.<sup>2</sup> Accordingly, this Petition addresses the determination described herein and asks the Commission to direct NANPA and/or the PA to provide the requested relief to the extent it is within the

<sup>1</sup> See, e.g., 47 C.F.R. §52.15.

<sup>2</sup> See Third Report and Order and Second Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200, *Numbering Resource Optimization; etc.*, 17 FCC Rcd 252, ¶61 (2001) ("*Third NRO Order*").

respective authority and responsibility of NANPA and/or the PA to do so. The denial that is the subject of this Petition impacts TCA's customer PricewaterhouseCoopers, LLP.

In support of this Petition, TCA states:

1. TCA is a telephone utility that provides, among other things, intraLATA, local exchange telecommunications services in various portions of South Carolina, including the Columbia exchange.

2. NANPA is an independent non-governmental entity that is responsible for administering and managing the North American Numbering Plan ("NANP").<sup>3</sup>

3. The PA is an independent non-governmental entity that is responsible for administering thousands-block number pooling.<sup>4</sup>

4. On March 31, 2000, the FCC issued an Order relating to numbering resource optimization.<sup>5</sup> The goal of the *First NRO Order* was to implement uniform standards governing requests for telephone numbering resources in order to increase efficiency in the use of existing telephone numbers and to avoid further exhaustion of existing numbers.

5. Among other things, the FCC required that, to qualify for access to new numbering resources, applicants must establish that existing inventory within the applicant's rate center will be exhausted within six months of the application. The FCC reaffirmed this

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<sup>3</sup> See 47 C.F.R. § 52.13 (a), (b).

<sup>4</sup> See 47 C.F.R. §52.7(g). See also 47 C.F.R. §52.20 ("Thousands-block number pooling is the process by which the 10,000 numbers in a central office code (NXX) are separated into ten sequential blocks of 1,000 numbers each (thousands-blocks), and allocated separately within a rate center.").

<sup>5</sup> See Report and Order and Further Notice of Proposed Rule Making, *Numbering Resources Optimization*, 15 FCC Rcd 7574 (2000) ("*First NRO Order*").

requirement in two subsequent orders.<sup>6</sup> Prior to this ruling, the Central Office Code Assignment Guidelines used to make code assignments required the applicant's existing number inventory within the applicant's serving switch to exhaust within six months of the code application or the carrier had to prove that it was unable to meet a specific customer's request with its current inventory of numbers in order for a code to be assigned.

6. In addition to the months-to-exhaust ("MTE") requirement described above, the FCC's rules also required carriers to meet a rate center utilization threshold of 60 percent in order to receive additional numbering resources in a given rate center.<sup>7</sup> The utilization threshold has increased by five percent per year, and it has now reached the maximum of 75 percent. Based on the FCC's orders, carriers must meet both the six months MTE requirement and the utilization threshold on a rate center basis in order to obtain numbering resources.<sup>8</sup>

7. On or about August 21, 2017, TCA submitted a Pooling Administration System request for the assignment of a thousands-blocks in the Columbia rate center to integrate into its customer's existing dialing plan. The request was for the block to be of the format: 803-766-7XXX, 803-881-7XXX, or 803-977-3XXX. In order to meet the customer's express request for numbers,<sup>9</sup> TCA requested the assignment of one thousands-blocks in the Columbia rate center.<sup>10</sup>

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<sup>6</sup> See Second Report and Order, Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200, and Second Further Notice of Proposed Rulemaking in CC Docket No. 99-200, *Numbering Resource Optimization*, 16 FCC Rcd 306 at ¶29 (2000) ("*Second NRO Order*"); *Third NRO Order* at ¶¶48-49.

<sup>7</sup> See *Second NRO Order* at ¶22; *Third NRO Order* at ¶¶50-52.

<sup>8</sup> *Third NRO Order* at ¶¶50-52.

<sup>9</sup> See Exhibit A to this Petition. We have redacted certain commercially-sensitive information from Exhibit A.

<sup>10</sup> See Exhibit B to this Petition.

TCA does not have the existing numbers to meet the customer's request and, therefore, is requesting that a new code be opened and these numbers be assigned to it.

8. TCA's application was completed in accordance with Industry Numbering Committee ("INC") guidelines, and TCA filled out the necessary MTE Certification Worksheets as required.

9. At the time of the filing of the numbering resource request, the Columbia Rate Center had an MTE of 12.245 months and a utilization of 92.033%.<sup>11</sup>

10. Thereafter, also on August 21, 2017, TCA's request was denied because TCA had not met the MTE criterion now set forth in the INC Guidelines.<sup>12</sup> TCA's numbering resource requests were denied despite the fact that TCA does not have adequate numbering resources needed to satisfy this customer's demands in the Columbia Rate Center.

11. TCA's inability to provide this important customer with the requested numbering resources prevents TCA from providing the quality of service this customer desires, needs, and expects. If TCA is not assigned the numbering resources needed to meet the customer's request, TCA will be unable to provide telecommunications services requested by its customer. The refusal to grant numbering resources sufficient to meet the needs of this customer is inconsistent with the FCC's position that "(u)nder no circumstances should consumers be precluded from receiving telecommunications services of their choice from providers of their choice for want of numbering resources."<sup>13</sup>

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<sup>11</sup> *See Id.*

<sup>12</sup> *See Id.*

<sup>13</sup> *Second NRO Order* at ¶ 61.

12. Both the FCC's rules and the INC Guidelines provide that state regulatory authorities have the power and authority to review a decision to deny a request for numbering resources.<sup>14</sup>

13. Prior to the FCC's Order and the resulting change in the INC Guidelines, the applicable MTE procedures permitted a carrier to receive a code assignment, even if the MTE requirement at the switch level was not met. These waivers or exceptions were granted where customer hardships could be demonstrated or where the service provider's inventory did not have a block of sequential numbers large enough to meet the customer's specific request. Under today's procedures, numbering determinations are based on the MTE for the entire rate center without any exceptions. The FCC has determined, however, that States may grant relief "if a carrier demonstrates that it has received a customer request for numbering resources in a given rate center that it cannot meet with its current inventory."<sup>15</sup> In addition, the FCC has ruled that, "States...may grant requests for customers seeking contiguous block of numbers."<sup>16</sup>

14. TCA requests that the Commission reverse the decision to withhold numbering resources from TCA because that decision interferes with TCA's ability to provide telecommunication services to its customers.

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<sup>14</sup> See *Third NRO Order*, Appendix A, Final Rules, § 52.15(g) (4) ("The carrier may challenge the NANPA's decision to the appropriate state regulatory commission"); *Third NRO Order* at ¶¶ 61-66; *Central Office Code (NXX) Assignment Guidelines*, INC 95-407-009, § 13.0 (rev. April 26, 1999)(CO Code Guidelines) ("Appeals may include but are not limited to one or more of the following options: . . . C. The CO Code Administrator(s) and code holders/applicants may pursue the disagreement with the appropriate governmental/regulatory body").

<sup>15</sup> *Third NRO Order* at ¶ 64.

<sup>16</sup> *Id.*

15. This Commission (see Docket No. 2002 –185-C, Order No. 2002-415) and other state regulatory agencies in Alabama, Florida, Georgia, Louisiana, North Carolina, and Tennessee similarly have recognized their jurisdiction and authority to review numbering denials and to order the release of number resources to TCA to meet customer needs.

**WHEREFORE**, TCA requests that the Commission:

- A. Reverse the decision to deny TCA's request for additional numbering resources;
- B. Direct NANPA and/or the PA (to the extent it is within the respective authority and responsibility of NANPA and/or the PA to do so) to provide a thousand block in the Columbia rate center, specifically 803-766-7XXX, 803-881-7XXX, or 803-977-3XXX.; and
- C. Grant the requested relief as soon as possible.

Respectfully submitted this 25<sup>th</sup> day of August, 2017.



Patrick W. Turner  
675 W. Peachtree St., NE  
Room 4323  
Atlanta, Georgia 30308

ATTORNEY FOR TELEPORT  
COMMUNICATIONS AMERICA, LLC

# EXHIBIT A





**Date: 8/11/2017**

**PricewaterhouseCoopers, LLP.**

300 Madison Avenue  
New York, NY 10017-6232  
United States

AT&T TNAC,

This Letter of Intent represents a request by PricewaterhouseCoopers LLP to AT&T for 500 numbers for AT&T Site ID: [REDACTED]. PricewaterhouseCoopers intends to order service, in the COLUMBIA rate center, on the [REDACTED] switch pending AT&T's successful completion of the required testing. PricewaterhouseCoopers intends to activate these numbers within 180 days from AT&T's receipt of the numbers.

PricewaterhouseCoopers currently has an existing network configuration and therefore technical restrictions exist in the following blocks.

Block 0 (0000-0999): 0000-0999 committed to another NPA/NXX in Dial Plan

Block 1 (1000-1999): 1188-1707; 1908-1987 committed to another NPA/NXX in Dial Plan

Block 2 (2000-2999): 2200-2299; 2560-2599; 2700-2968 committed to another NPA/NXX in Dial Plan

Block 4 (4000-4999): 4075-4460 committed to another NPA/NXX in Dial Plan

Block 5 (5000-5999): 5000-5997 committed to another NPA/NXX in Dial Plan

Block 6 (6000-6999): 6350-6449 committed to another NPA/NXX in Dial Plan

Block 8 (8000-8999): 8100-8199 committed to another NPA/NXX in Dial Plan

Block 9 (9000-9999): 9100-9199 committed to another NPA/NXX in Dial Plan

**Blocks 3XXX & 7XXX are acceptable**

PricewaterhouseCoopers LLP conducts business in 22 states. These numbers must run in sequential order (example 1000 thru 1499). PwC has constructed a dialing plan to allow abbreviated dialing within the organization. If PwC is unable to obtain the requested ranges, it will force 10 digit dialing across the organization, which would be regarded as failing to deliver on a stated critical business requirement for this project, that AT&T is a key partner.

PWC office is growing rapidly at 3400 Forest Drive, Columbia, SC 29204 and needs numbers to keep up with their client's needs. This location is growing and our request will cover need for the next 1-3 years.

Sincerely,

Jason A. Smiles  
Manager, IT Enablement  
PricewaterhouseCoopers LLP

# EXHIBIT B

Tracking Number: 803-COLUMBIA-SC-1033862

Thousands-Block Application Form - Part 1A  
Revised: January 4, 2016

Individual Block  
Request

Type of  
Application:      New                      Change <sup>i</sup>                      Disconnect

General Application Information

1.1 Contact Information:

Block Applicant:

Company  
Name: TELEPORT COMMUNICATIONS AMERICA - SC - LLC

Headquarters  
Address: One AT&T Way

City: Bedminster      State: NJ      ZIP: 07921

Contact  
Name: Tammy Bryant

Contact  
Address: 358 Old Main Street

City: Asbury      State: NJ      ZIP: 08802

Phone: 908-537-0179      Fax: 210-893-2281

E-mail: tbryant@att.com

Pooling Administrator:<sup>ii</sup>

Contact  
Name: John Auerbach

Contact  
Address: 1800 Sutter St. Ste. 780

City: Concord      State: CA      ZIP: 94520

Phone: 925-363-8700      Fax: 925-363-7684

E-mail: john.auerbach@neustar.biz

1.2 General Information:

Check one : No LRN needed \_\_\_\_\_ LRN needed<sup>iii</sup>: \_\_\_\_\_

NPA: 803 LATA: 434 OCN<sup>iv</sup>: 635C Parent Company's OCN 7125

Number of Thousands-Blocks Requested : 1

Switch Identification (Switching Entity/POI<sup>v</sup>):  
CLMASC9NX1Z

Rate Center<sup>vi</sup>: COLUMBIA

1.3 Dates:

Date of Application<sup>vii</sup>: 08/21/2017 Requested Effective Date<sup>viii</sup>: 08/21/2017

Requested Expedited Treatment? (See Section 8.6) Yes \_\_\_\_\_ No X

By selecting this checkbox, I acknowledge that I am requesting the earliest possible effective date the Administrator can grant. Please note that this only applies to a reduction in the Administrator's processing time, however the request will still be processed in the order received.

1.4 Type of Service Provider Requesting the Thousands-Block :

a) Type of Service Provider : CAP OR CLEC (LEC, IXC, CMRS, Other)

b) Primary Type of Service Blocks to be used for : Wireline

c) Thousands-Block(s) (NXX-X) assignment preference (Optional) \_\_\_\_\_  
803-766-7 1ST 803-881-7 2ND 803-877-3,7 - LAST

d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment , if any \_\_\_\_\_

e) If requesting a code for LRN purposes, indicate which block(s) you will be keeping (the remainder of the blocks will be given to the pool) \_\_\_\_\_

1.5 Type of Request:

Initial block for rate center : Yes \_\_\_\_\_ If Yes, attach evidence of authorization and proof of capability to provide service within 60 days.

Growth block for rate center : Yes X If Yes, attach months to exhaust worksheet

By selecting this checkbox, I acknowledge that I am willing to accept a block in red and explicitly understand that the underlying CO code may not yet be activated in the PSTN and loaded in the NPAC on the block effective date.

Type of change (Mark all that apply)

OCN: Intra-company<sup>ix</sup> Switching Id Part 1B

OCN: Inter-company<sup>x</sup> Effective Date

Change block : Yes \_\_\_\_\_ If Yes, list NPA-NXX-X \_\_\_\_\_

#### 1.6 Block Return :

- a) Is this block Contaminated: Yes \_\_\_\_\_ No \_\_\_\_\_
- b) If Yes how many TNs are NOT available for assignment : \_\_\_\_\_
- c) Have all new Intra SP ports been completed in the NPAC: Yes \_\_\_\_\_ No \_\_\_\_\_
- d) Has this block been protected from further assignment: Yes \_\_\_\_\_ No \_\_\_\_\_

Disconnect block : Yes \_\_\_\_\_ If Yes, list NPA-NXX-X \_\_\_\_\_

#### Remarks:

I hereby certify that the above information requesting an NXX-X block is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Thousands-Block (NXX-X) Pooling Administration Guidelines ATIS-0300066 available on the ATIS web site ([www.atia.org/inc](http://www.atia.org/inc)) or by contacting [inc@atis.org](mailto:inc@atis.org) as of the date of this application.

**Tammy Bryant**

**Sr. Specialist - Network Support**

**08/21/2017**

Signature of Block Applicant Title

Date

#### Instructions for filling out each Section of the Part 1A form:

Section 1.1 Contact information requires that Service Providers supply under "Block Applicant" the company name, company headquarters address, a contact within the company, an address where the contact person may be reached, in addition to the correct phone, fax, and e-mail address. The Pooling Administrator section also requires the Service Provider to fill in the Pooling Administrator's name, address, phone, fax and e-mail.

Section 1.2 Service Providers who need a thousands-block assignment or for an Location Routing Number (LRN) are required to fill in this section. If needed for

an LRN, a CO Code Application needs to also be submitted to the PA. The Service Provider should supply the Numbering Plan Area (NPA); the Local Access Transport Area (LATA), which is a three-digit number that can be found in the Telcordia Technologies, Inc. dba iconectiv (iconectiv™) LERG™ Routing Guide<sup>xi</sup>. The Operating Company Number (OCN) assigned to the service provider and the OCN of its parent company. An OCN is a four-character alphanumeric NECA-assigned Company Code or a four-character alphanumeric identifier assigned by the iconectiv™ Telecom Routing Administration (TRA). In addition, the number of thousands-blocks requested should be supplied. The Switch Identification. Explanations of these terms may be found in the footnotes.

**Section 1.3** The date the Service Provider completes the application should be entered in this section, as well as the Effective Date of the requested thousands-block.

**Section 1.4** Service Providers should indicate their type, e.g., local exchange carrier, competitive local exchange carrier, interexchange carrier, CMRS or VoIP. Also indicate the primary type of business in which the numbering resource is to be used. Service Providers may indicate their preference for a particular thousands-block, e.g., 321-9XXX, or indicate any thousands-blocks that may be undesirable, e.g., 321-6XXX.

**Section 1.5** Service Providers indicate the type of request. Initial requests are for first applications for thousands-blocks in a rate center, growth for additional thousands-blocks in a rate center in which the applicant already has numbering resources, and provide the required evidence as ordered by the FCC.

**Section 1.6** Service Providers must indicate the updated/current information in regards to contaminated TNs on the block they are returning to the pool. Blocks with over 10% contamination (101 TNs or more) shall not be returned to the pool except when a service provider is exiting the market or is exchanging a block that was identified as being over 10% contaminated. If the block being returned is over 10% contaminated, the PA shall seek a new block holder. If question c and/or d have a response of No, the request for return shall be denied.

The thousands-block applicant certifies veracity of this form by signing their name, and providing their title and date.

**Footnotes:**

<sup>i</sup>Identify the type of change(s) in Section 1.5.

<sup>ii</sup>The Pool Administrator is available to assist in completing these forms.

<sup>iii</sup>A CO Code application will also need to be submitted to the PA.

<sup>iv</sup>Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments should contact NECA (800 524-1020) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignments should direct questions regarding appropriate OCN usage to TRA (732-699-6700).

Part1A

<sup>v</sup>This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character CLLI<sup>TM</sup> Code of the switch /POI.

<sup>vi</sup>Rate Center name must be a tariffed Rate Center.

<sup>vii</sup>Acknowledgment and indication of disposition of this application will be provided to applicant within seven calendar days from the date of receipt of this application. An incomplete form may result in delays in processing this request.

<sup>viii</sup>Please ensure that the NPA-NXX of the LRN to be associated with this block(s) is/will be active in the PSTN prior to the effective date of the block(s).

<sup>ix</sup>Select if you are the current Block Holder.

<sup>x</sup>Select if you are not the current Block Holder

<sup>xi</sup>Common Language<sup>®</sup> and Telcordia<sup>®</sup> are registered trademarks and CLLI<sup>TM</sup>, LERG<sup>TM</sup> Routing Guide and iconectiv<sup>TM</sup> are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

Thousands-Block Number Pooling Administration Guidelines (TBPAG) - Appendix 3

Revised: January 4, 2016

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level<sup>1</sup>

(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: 803-COLUMBIA-SC-1033862

Date: Monday, August 21, 2017 OCN: 635C Company Name: TELEPORT COMMUNICATIONS AMERICA - SC - LLC

Rate Center: COLUMBIA

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)<sup>2</sup>: NPA NXX BLOCK ID 803 223 A 803 223 0 803 250 4 803 567 6 803 638 5 803 724 6 803 862 4 803 881 5 803 908 4

Name of Block Applicant: Tammy Bryant

Signature: Tammy Bryant

Title: Sr. Specialist - Network Support  
210-893-2281

Phone: 908-537-0179-

Fax:

E-Mail: tbryant@att.com

A. Available Numbers: 1449

B. Assigned Numbers: 5522

C. Total Numbering Resources: 7000

D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation <sup>3</sup>: 1000

List

Excluded 803-881-5  
Code(s) or



Block(s):

Month	Month	Month	Month	Month	Month	Month	Month	Month	Month	Month	Month	Month
1	2	3	4	5	6	7	8	9	10	11	12	

E. Growth  
History -  
Previous 6  
months<sup>4</sup>

<u>38</u>	<u>121</u>	<u>0</u>	<u>13</u>	<u>35</u>	<u>0</u>
-----------	------------	----------	-----------	-----------	----------

F. Forecast  
- Next 12  
months<sup>5</sup>

<u>535</u>	<u>35</u>	<u>35</u>	<u>35</u>	<u>35</u>	<u>35</u>	<u>35</u>	<u>35</u>	<u>35</u>	<u>35</u>	<u>35</u>	<u>35</u>
------------	-----------	-----------	-----------	-----------	-----------	-----------	-----------	-----------	-----------	-----------	-----------

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6): 118.333

H. Months  
to Exhaust<sup>6</sup>  
=

Numbers Available for Assignment to  
Customers (A)

Average Monthly Forecast (G)

Block Requested  
1

Available Numbers  
1449

Months To Exhaust  
12.245

I.  
Utilization<sup>7</sup>  
=

Assigned Numbers (B)

X 100 = 92.033

Total Numbering Resources (C)-Excluded  
Numbers (D)

Explanation: \_\_\_\_\_

<sup>1</sup>A copy of this worksheet is required to be submitted to the Pooling Administrator when requesting additional numbering resources in a rate center. For auditing purposes, the applicant must retain a copy of this document.

<sup>2</sup>Report on all resources for the requested geographic area, including newly acquired blocks/codes.

<sup>3</sup>Quantity of numbers activated in the past 90 days is based on blocks and/or codes received from the administrator and shall be reported in increments of 1,000 or 10,000 TNs (e. g.: 2 blocks received=2,000 and 1 code received =10,000).

<sup>4</sup>Net change in TNs no longer available for assignment in each previous month, starting with the most distant month as Month 1, and Month 6 as the current month.

<sup>5</sup>Forecast of TNs needed in each following month, starting with the most recent month as Month 1.

<sup>6</sup>To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" must be less than or equal to 6 months. (47 CFR § 52.15 (g) (4) (iii)).

<sup>7</sup>Newly acquired numbers may be excluded from the Utilization calculation (47 CFR § 52.15 (g)(4)(ii))

**BRYANT, TAMMY**

**From:** john.auerbach@neustar.biz  
**Sent:** Monday, August 21, 2017 11:41 AM  
**To:** BRYANT, TAMMY  
**Cc:** PA\_Part3@neustar.biz  
**Subject:** 803-COLUMBIA-SC-1033862 DENIED PAS - Part 3 Confirmation

**Pooling Administration System**

Dated 21 August 2017

**Thousands-Block Number Pooling Administration Guidelines  
(TBPAG) - Part 3**

Revised: January 4, 2016

**Pooling Administrator's Response/Confirmation**

**Tracking Number :** 803-COLUMBIA-SC-1033862

**Date of Application:** 08/21/2017 **Effective Date:** \_\_\_\_\_  
**Date of Receipt:** 08/21/2017 **Date of Response:** 08/21/2017

**Service Provider Name:** TELEPORT COMMUNICATIONS AMERICA - SC - LLC  
**(LERG<sup>TM</sup> Routing Guide<sup>1</sup>) OCN:** 635C  
**Parent Company OCN:** 7125

**NPAC SOA SPID :** \_\_\_\_\_

**Pooling Administrator Contact Information:**

**John Auerbach** **Phone:** 925-363-8706  
**Signature of Pooling Administrator**  
**John Auerbach** **Fax:** 925-363-7684  
**Name (print)**  
**Email:** john.auerbach@neustar.biz

**NPA-NXX or** \_\_\_\_\_ **Block Assigned:** \_\_\_\_\_  
**NPA-NXX-X :** \_\_\_\_\_ **Block Reserved :** \_\_\_\_\_

8/21/2017

File:///C:/Users/b1942/AppData/Local/Temp/Low/50N6QTDZ.htm

## Block Reservation

Expiration Date : \_\_\_\_\_

Block/Code \_\_\_\_\_

Modified : \_\_\_\_\_

Block/Code \_\_\_\_\_

Disconnected : \_\_\_\_\_

Block Contaminated (Yes or No): \_\_\_\_\_

If yes, enter the number of TNs contaminated (1-1000): \_\_\_\_\_

Switch Identification (Switching/POI)<sup>2</sup>: \_\_\_\_\_

CLMASC9NX1Z

Rate Center: \_\_\_\_\_

COLUMBIA

☒ Form complete, request denied.

Explanation:

DR-57: You do not meet the MTE and/or Utilization requirements, therefore this request for a new block is denied. You may proceed with requesting a State Waiver from the appropriate state commission using this Part 3 denial. If you are in disagreement with the disposition of this request, please refer to the Thousands-Block Number (NXX-X) Pooling Administration Guidelines for the appeals process.

☐ Request Withdrawn.

Explanation:

☐ Assignment Activity Suspended by Administrator.

Explanation:

Remarks:

<sup>1</sup> Telcordia® is a registered trademark and LERG™ Routing Guide and iconectiv™ are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

<sup>2</sup> This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the Common Language® Location Code (CLLI™ Code) of the switching entity/POI shown on the Part 1A form. Common Language® is a registered trademark and CLLI is a trademark and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

neustar